

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR)	
PRESIDENT, INC., et al.,)	No. 4:20-CV-02078
Plaintiffs,)	
)	Hon. Matthew Brann
v.)	
)	
KATHY BOOCKVAR, et al.,)	
Defendants.)	

**MOTION FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE IN
OPPOSITION TO PLAINTIFFS' MOTION
FOR INJUNCTIVE RELIEF AND
IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

1. The Movant, Democrats Abroad (“DA”), by and through its undersigned counsel, seeks leave to participate in this case as Amicus Curiae in support of the Defendants' Motions to Dismiss.

2. DA is the official Democratic Party arm for the millions of Americans living outside the United States. DA is recognized as a “state” party by the Democratic National Committee and is represented on the DNC by eight voting members at the quadrennial Democratic National Convention with pledged delegates. DA is staffed by volunteers who assist overseas voters with registration, run a global voter registration effort and support overseas voters with a 24/7 help

desk. DA researches voting and election information specific to overseas voters for all 50 states and the 6 non-state US jurisdictions (District of Columbia, Puerto Rico, American Samoa, Guam, US Virgin Islands, and Northern Mariana Islands), including: requirements for voting for each jurisdiction; deadlines for submitting voter registration, ballot requests, and returning ballots; available methods for returning forms and ballots; state-specific requirements for overseas voting; and update contact information for local election offices. Volunteers also respond to questions from overseas voters and provide support to help them request their ballots and vote from overseas. As part of their preparation for upcoming elections, DA staff contacts the various Secretary of State offices and Local Election Offices (LEOs) to verify election information is correct and up to date. They also contact LEO offices on behalf of overseas voters who need help with registering, requesting their ballots, and/or returning their ballots. Since DA works closely with voters who use absentee and mail-in ballots every year, they are experts in dealing with these issues in all 50 states and the six non-state jurisdictions and their expertise is highly relevant to mail-in voting.

3. DA has more than eight thousand members who vote in Pennsylvania, including in each of the Defendant counties. DA has already diverted significant resources to dealing with Pennsylvania absentee ballot issues, and will have to spend much more staff time and resources counseling its members on Pennsylvania developments, and interacting with Pennsylvania election staff, if the case is not dismissed.

4. This case involves Plaintiffs' attack on the legitimacy of mail in ballots submitted and counted in each of the Defendant counties, including those submitted by Amicus' members. Given the Amicus's mission of protecting its members and representing their interests in communicating with LEOs, Amicus is uniquely situated to advocate that its thousands of Pennsylvania members not be disenfranchised by Plaintiffs.

5. To that end, the DA seeks to submit a Brief, attached hereto as Exhibit A, protecting its members' interests and advocating for dismissal of the Complaint and against Plaintiffs' prayed-for relief. WHEREFORE, the Caucus requests that this Court grant this Motion for Leave to Participate as Amicus Curiae, and accept and consider the Brief attached hereto during the disposition of this proceeding.

Respectfully submitted,

/s/

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¹ *Pro hac vice* motions for Remy Green and Jonathan Wallace have been filed simultaneously with this motion and proposed brief.